

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	Indra LAKSONO		
Title:	SYSTEM AND METHOD FOR MULTIPLE CHANNEL VIDEO TRANSCODING		
App. No.:	09/990,976	Filed:	11/21/2001
Examiner:	WONG, Allen C.	Group Art Unit:	2613
Customer No.:	29331	Confirmation No.:	4211
Atty. Dkt. No.:	VIXS.0100120 (1459-VIXS012)		

Mail Stop AF
Commissioner for Patents
PO Box 1450
Alexandria, VA 22313-1450

**REMARKS IN SUPPORT OF
THE PRE-APPEAL BRIEF REQUEST FOR REVIEW**

Dear Sir:

In response to the Final Office Action mailed November 21, 2006 (hereinafter "the Final Action") and pursuant to the Notice of Appeal and Pre-Appeal Brief Request for Review submitted herewith, the Applicant requests review of the following issues on appeal.

Request for at least three examiners on the panel

In order to facilitate full consideration of the remarks filed herewith, the Applicant respectfully requests that the Art Unit Supervisor designate a panel composed of at least three examiners.

The proposed combination of Keith and Youn fails to disclose or suggest accessing a first index table comprising a plurality of entries, each entry comprising an identifier associated with a corresponding memory location storing corresponding macroblock information as recited by claim 26

Independent claim 26 recites the feature of "accessing a first index table comprising a plurality of entries, each entry comprising an identifier associated with a corresponding memory location storing corresponding macroblock information." With respect to this feature, the Final Action asserts that the lookup table at col. 43 of Keith is "accessed or indexed" and further that

Keith discloses at the passages at col. 42, lines 11-23 and col. 42, line 66 to col. 43, line 15 the use of pointers to indicate the position of a value from the lookup table or index table of the entry of the block portion.” *Final Action*, p. 7. For ease of reference, the cited table of Keith is reproduced below:

Table[bit pointer]=0	for bit pointer = 0, . . . , 7
Table[bit pointer]=1	for bit pointer = 8, . . . , 15
Table[bit pointer]=2	for bit pointer = 16, . . . , 23
	etc.

Keith, col. 43, lines 4-8.

As described by Keith, “[t]his processing is based on a lookup table [reproduced above] that maps the possible bit pointer values to the values to be added to the byte pointer. The bit pointer is used as the index to the table [reproduced above].” *Keith*, col. 42, line 66 to col. 43, line 4 (emphasis added). Contrary to the assertions of the Final Action, Keith does not disclose, or even suggest, that the cited table (reproduced above) comprises a plurality of entries, each entry comprising an identifier associated with a corresponding memory location storing corresponding macroblock information as recited by claim 26. Rather, as described by Keith, the cited table “maps the possible bit pointer values to the values to be added to the byte pointer” and thus serves merely as a table to increment a byte pointer. *See also Keith*, col. 43, lines 9-16 (stating “[t]he byte pointer is then incremented by the value (2) retrieved from the lookup table [reproduced above] using the updated bit pointer (21) as the index (step 3204)”). There is no disclosure that the entries of the table of Keith comprise any identifier associated with a corresponding memory location, much less associated with a corresponding memory location storing corresponding macroblock information as recited by claim 26. The Final Action does not assert that any of the other cited references discloses or suggests this feature. Accordingly, each of the proposed combinations of the cited references fail to disclose or suggest at least the feature of “accessing a first index table comprising a plurality of entries, each entry comprising an identifier associated with a corresponding memory location storing corresponding macroblock information” as recited by claim 26.

The proposed combination of Keith and Youn fails to disclose or suggest accessing a first plurality of macroblock information in a first order based on identifiers accessed from a first subset of the plurality of entries of the first index table as recited by claim 26

Claim 26 further recites the feature of “accessing a first plurality of macroblock information in a first order based on identifiers accessed from a first subset of the plurality of entries of the first index table.” With respect to this feature, the Final Action again points to the lookup table of Keith reproduced above and asserts that “Keith discloses video decoding the information from the lookup table that stores data pertaining to macroblock data like quantization level and motion vector data in a certain order.” *Final Action*, p. 7. However, as discussed above, the relied-upon table of Keith merely serves as a means for updating a byte pointer based on a bit pointer which is used as an index to the lookup table so as to determine a value to add to the byte pointer. The lookup table of Keith does not “[store] data pertaining to macroblock data” as asserted by the Final Action, nor does Keith disclose or suggest that a plurality of macroblock information is accessed in a first order based on identifiers accessed from a subset of the plurality of entries of an index table as provided by claim 26. The other cited references also fail to disclose or suggest this feature. Accordingly, each of the proposed combinations of Keith and the other cited references also fails to disclose or suggest at least the features of “accessing a first plurality of macroblock information in a first order based on identifiers accessed from a first subset of the plurality of entries of the first index table” as recited by claim 26.

The proposed combination of Keith and Youn fails to disclose or suggest accessing a first plurality of macroblock information in a first order based on identifiers accessed from a first subset of the plurality of entries of the first index table as recited by claim 26

Independent claim 41 recites the features of “an index table generator having an input to receive a size indicator of a destination image and an output to provide data representative of an index table identifying a first portion of the plurality of source macroblock information to be used to generate a first destination source vector, wherein the index table is based on the size indicator of the destination image.” With respect to these features, the Final Action points again to the above-reproduced table of Keith and asserts that the “lookup table is accessed or indexed to store information pertaining to identify a certain portion of plural macroblock data, and that the image size is accounted for as shown in fig. 15.” *Final Action*, p. 9. As a first issue, Keith does not disclose or suggest that the above-reproduced table is generated by any component of

the system of Keith and thus Keith fails to disclose or suggest an index table generator having an input to receive a size indicator of a destination image and an output to provide data representative of an index table as provided by claim 41. As a second issue, Keith does not disclose or suggest that the above-reproduced table identifies a first portion of a plurality of source macroblock information to be used to generate a first destination source vector. Rather, as discussed above, the above-reproduced table of Keith merely serves as a means to increment a byte pointer based on a value indexed by a bit pointer. As a third issue, regardless of whether “the image size is accounted for as shown in fig. 15” of Keith (*Id.*), Keith fails to disclose or suggest that the above-reproduced table is based on an image size, and thus Keith fails to disclose or suggest the feature of “wherein the index table is based on the size indicator of the destination image” as recited by claim 41. The Final Action does not assert that the other cited references disclose or suggest any of these features, nor in fact are these features disclosed or suggested by the other cited references. Accordingly, each of the proposed combinations of Keith and the other cited references fails to disclose or suggest at least the features of “an index table generator having an input to receive a size indicator of a destination image and an output to provide data representative of an index table identifying a first portion of the plurality of source macroblock information to be used to generate a first destination source vector, wherein the index table is based on the size indicator of the destination image” as recited by claim 41.

The proposed combination of Keith and Chen fails to disclose or suggest determining an index table based on a video source resolution and a video destination resolution, wherein the index table comprises a plurality of entries, each entry comprising an identifier associated with a memory location storing source macroblock information for a corresponding source macroblock as recited by claim 37

Independent claim 37 recites the features of “determining an index table based on a video source resolution and a video destination resolution, wherein the index table comprises a plurality of entries, each entry comprising an identifier associated with a memory location storing source macroblock information for a corresponding source macroblock.” With respect to these features, the Final Action relies on Keith as disclosing these features as described above with reference to independent claim 26. However, as noted above, Keith does not disclose, or even suggest, that the cited table (reproduced above) comprises a plurality of entries, each entry comprising an identifier associated with a corresponding memory location storing corresponding macroblock information as recited by claim 26. There is no disclosure that the entries of the

table of Keith comprise any identifier associated with a corresponding memory location, much less associated with a corresponding memory location storing corresponding macroblock information as recited by claim 37. The Final Action does not assert that the other cited references disclose or suggest this feature. Accordingly, each of the proposed combinations of Keith and the other cited references fails to disclose or suggest at least the feature of “determining an index table based on a video source resolution and a video destination resolution, wherein the index table comprises a plurality of entries, each entry comprising an identifier associated with a memory location storing source macroblock information for a corresponding source macroblock” as recited by claim 37.

Conclusion

As discussed above, the Office fails to establish that the proposed combinations of the cited references disclose or suggest each and every element recited by any of the pending claims. Accordingly, reconsideration and withdrawal of these rejections is respectfully requested.

Respectfully submitted,

/Ryan S. Davidson/

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December 12, 2006

Date

PRE-APPEAL BRIEF REQUEST FOR REVIEW

Docket Number (Optional)

VIXS.0100120 (1459-VIXS012)

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to "Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450" [37 CFR 1.8(a)]

on _____

Signature _____

Typed or printed name _____

Application Number

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Filed

2001-11-21

First Named Inventor

Indra LAKSONO

Art Unit

2613

Examiner

Allen C. WONG

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).

Note: No more than five (5) pages may be provided.

I am the

☐ applicant/inventor.

/Ryan S. Davidson/

Signature

☐ assignee of record of the entire interest.
See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed.
(Form PTO/SB/96)

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☐ attorney or agent acting under 37 CFR 1.34.
Registration number if acting under 37 CFR 1.34 _____

December 12, 2006

Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required.
Submit multiple forms if more than one signature is required, see below.

☐ *Total of _____ forms are submitted.

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